

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

MARIA MOE,

Plaintiff,

v.

Civil Action No. 1:25-cv-10195

DONALD TRUMP, in his official capacity as
President of the United States; JAMES R.
MCHENRY III, in his official capacity as Acting
Attorney General of the United States; WILLIAM
LOTHROP, in his official capacity as Acting
Director of the Federal Bureau of Prisons;

Defendants.

**PLAINTIFF’S MOTION TO PROCEED UNDER PSEUDONYM,
TO FILE UNDER SEAL, AND FOR PROTECTIVE ORDER**

Plaintiff MARIA MOE (“Plaintiff”), by and through her attorneys, hereby seeks authorization to proceed under a pseudonym in the above-captioned matter. In light of her status as an incarcerated transgender woman, the importance of sensitive medical information in this case, and the salience of this issue in the news media, Plaintiff is concerned about the social stigmatization, harassment, retaliation, discrimination, and potential violence she may experience from others, including those in and out of prison, that could cause her physical (including sexual) and/or mental harm if her identity is disclosed to the public.

Plaintiff respectfully requests that this Court (1) grant her motion to proceed under a pseudonym; (2) grant her motion to partially seal the Complaint and the papers filed in support of her emergency motion for a temporary restraining order and preliminary injunction and file the declaration of her Criminal Defense Attorney under seal; and (3) enter a protective order that (a) prohibits Defendants from disclosing Plaintiff’s identity to any third party unless such

disclosure is necessary to defend against this action, and (b) requires any party, including any third parties, that files a document identifying Plaintiff to redact all personal identifiers in accordance with Federal Rule of Civil Procedure 5.2, as well as (i) Plaintiff's biographical details, including but not limited to her age, place of residence, current and former names, date of birth, school experience, the identity of her mother and criminal defense attorney, (ii) her criminal history, including the crimes she was convicted of, quotes from the sentencing judge, the period of her incarceration, her disciplinary record, her rehabilitation activities, and her relationship and communications with her lawyer, (iii) all details of Plaintiff's medical history, records, treatments, and specific physical and mental health diagnoses, including those outside of her gender dysphoria, and (iv) any other information that could identify Plaintiff to the public.

Dated: January 26, 2025

Respectfully submitted,

/s/ Jennifer Levi

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